

My comments are as follows:

1. NIEHS should immediately adopt the new non-animal test methods. These methods have been considered for nearly 20 years, and no animals should continue to suffer and die due to bureaucratic inertia.
2. The use of animals in lethal dose tests should be completely replaced - government agencies should use in vitro cell culture tests. NIEHS recommends using the non-animal method to set the starting dose for further animal- poisoning tests. While this may reduce the number of animals killed in acute poisoning studies, it does not go far enough.
3. The EPA must immediately incorporate the non-animal cell culture method into its HPV chemical program, as promised in its October 1999 agreement with the animal protection community. At a minimum, every government agency that currently requires the acute animal-poisoning studies should immediately incorporate the in vitro cell culture method as a transitional means of reducing the number of animals killed and should fully support the use of this method as an eventual replacement for lethal-dose poisoning studies.

Sincerely,

Lynn Manley